REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-24 in the application. In the present response, the Applicants have not amended, canceled or added any claims. Accordingly, Claims 1-24 are currently pending in the application.

I.   Formal Matters and Objections

The Examiner has objected to the specification because of informalities. In response, the Applicants have amended the specification and Figure 1 to correct these inadvertent errors. Accordingly, the Applicants respectfully request the Examiner to withdraw the objection to the specification.

II.   Rejection of Claims 1, 9 and 17 under 35 U.S.C. §102

The Examiner has rejected Claims 1, 9 and 17 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,633,882 to Fayyad, *et al.* The Applicants respectfully disagree since Fayyad does not teach compressing a data table including, discovering data mining models with guaranteed error bounds of at least one attribute in the data table in terms of other attributes in the data table and selecting a subset of the at least one model to form a basis upon which to compress the data table. (*See* claims 1, 9 and 17.)

Fayyad is directed to data mining of large databases and, more particularly, to an improved method and apparatus for answering queries based on the data contained in large databases. (*See* column 1, lines 7-10.) Fayyad discloses a data mining engine 12 that forms conclusions about the accuracy of a cluster model of a data table. Based on the conclusions, the

cluster model may be refined. (*See* column 9, lines 38-57.) The Applicants do not find, however, where Fayyad teaches selecting a subset of at least one data mining model to form a basis upon which to compress a data table as recited in independent Claims 1, 9 and 17. In fact, the applicants do not find where Fayyad teaches selecting a subset of a data mining model for any purpose. On the contrary, as stated above, Fayyad teaches using data mining to test a cluster model. Thus, for at least these reasons, Fayyad does not teach each and every element of independent Claims 1, 9 and 17.

Since Fayyad does not teach each element of independent Claims 1, 9 and 17, Fayyad does not anticipate Claims 1, 9 and 17. Accordingly, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to Claims 1, 9 and 17 and allow issuance thereof.

III.   Rejection of Claims 2-8, 10-16 and 18-24 under 35 U.S.C. §103

The Examiner has rejected Claims 2-8, 10-16 and 18-24 under 35 U.S.C. §103(a) as being unpatentable over Fayyad in view of U.S. Patent No. 5,799,311 to Agrawal, *et al.,* ("Agrawal 311") for Claims 2, 4-5, 8, 10, 12-13, 16, 18, 20-21 and 24; U.S. Patent No. 6,810,368 to Pednault for Claims 2-3, 10-11 and 18-19; U.S. Patent No. 6,189,005 to Chakrabarti, *et al.,* for Claims 6, 14 and 22; and U.S. Patent No. 6,651,048 to Agrawal, *et al.* ("Agrawal 048") for Claims 7, 15 and 23. The Applicants respectfully disagree.

As discussed above, Fayyad does not teach selecting a subset of at least one data mining model to form a basis upon which to compress a data table as recited in independent Claims 1, 9 and 17. Additionally, Fayyad does not suggest selecting a subset of at least one data mining model to form a basis upon which to compress a data table as recited in independent Claims 1, 9 and 17.

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Instead, Fayyad teaches using data mining to refine a cluster model. (*See* column 9, lines 38-57.)

Agrawal 311, Pednault, Chakrabarti and Agrawal 048 have not been cited to cure the above deficiency of Fayyad but to teach the subject matter of the dependent claims identified above. Accordingly, the cited combinations of Fayyad with either Agrawal 311, Pednault, Chakrabarti or Agrawal 048 do not provide a *prima facie* case of obviousness of independent Claims 1, 9 and 17 and Claims dependent thereon. Thus, the cited combinations of Fayyad with either Agrawal 311, Pednault, Chakrabarti or Agrawal 048 do not render obvious Claims 2-8, 10-16 and 18-24. The Applicants, therefore, respectfully request the Examiner withdraw the under §103(a) rejection of Claims 2-8, 10-16 and 18-24 and allow issuance thereof.

IV.   Comment on Cited References

The Applicants reserve further review of references cited but not relied upon if relied upon in the future.
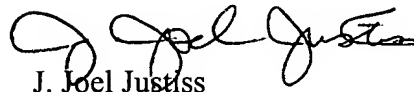
V.   Conclusion

In view of the foregoing amendment and remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 1-24.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application.

Respectfully submitted,

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IN THE DRAWINGS:

The attached Replacement Sheet 1/8 includes changes to Figure 1. More specifically, the reference numbers for RowAggregator 130 and CaRTBuilder 140 have been changed to RowAggregator 140 and CaRTBuilder 130, respectively.

Attachment: Replacement Sheet 1/8